

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-39-GMS
	:	
	:	
JEFFREY BENTLEY,	:	
	:	
Defendant.	:	

**MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

Defendant Jeffrey Bentley, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an order enlarging the time within which pretrial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions for this case are due by June 30, 2005.
2. Defense Counsel requires additional time to speak with Mr. Bentley to discuss how the defense is going to proceed and what motions, if any, should be filed. Also, defense counsel is currently in discussions with the government regarding a possible non-trial disposition in this case and requires additional time to complete these negotiations before it can be determined if pre-trial motions will be filed in this case.
3. Anne Park, Esquire, the attorney handling the case for the government, does not object to the enlargement of time.
4. The parties have agreed that any additional time given in which to file pre-trial

motions will be excludable under the Speedy Trial Act.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended to any time after July 29, 2005.

Respectfully Submitted,

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
First Federal Plaza  
704 King Street, Suite 110  
Wilmington, Delaware 19801  
Attorney for Defendant Jeffrey Bentley

Dated: June 30, 2005

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that a copy of Defendant's Motion to Extend Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on June 30, 2005, to:

Anne Park, Esquire  
Assistant U.S. Attorney  
1007 Orange Street  
Suite 700, P.O. Box 2046  
Wilmington, DE 19899-2046

/s/ Eleni Kousoulis  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
704 King Street Suite 110  
Wilmington, DE 19801  
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DATED: June 30, 2005